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April 17, 2020

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *Ver Bro*
VERNON S. BRODERICK
U.S.D.J. 5/11/2020

Re: *United States v. Gumora.*
Docket No.: 20-CR-144

Dear Judge Broderick:

I am CJA counsel to Defendant Joshua Gumora in the above referenced case. I was appointed to represent Mr. Gumora on February 18, 2020. I write to respectfully ask the Court to appoint Chase Ruddy, Esq., as associate CJA counsel to Mr. Gumora *nunc pro tunc* to February 18, 2020.

While this is a one-defendant case, we anticipate that there will be an extensive amount of discovery. Additionally, this case has already presented complicated issues relating to Mr. Gumora's health and conditions of confinement in light of the COVID-19 pandemic that led to an extensive defense investigation and the filing of multiple defense submissions, and which culminated in a two-and-a-half hour telephonic detention hearing.

Mr. Gumora remains detained at the MCC New York, and the task of communicating with him and reviewing with him the extensive discovery in this case is and will continue to be a significant undertaking, especially as we continue to adapt to the changing conditions presented by COVID-19.

Mr. Ruddy has already done a significant amount of work behind-the-scenes to assist me with Mr. Gumora's case. Mr. Ruddy is an experienced attorney who has worked for my firm since September 2011. He has been admitted to practice in the Southern and Eastern Districts of New York, and the District of New Jersey, for more than seven years and has worked on well over 100 federal criminal cases with me, including numerous CJA matters. He has previously been appointed as associate CJA counsel in this district, including in a recent case before Judge Preska (*United States v. Nikoloz Jikia*, 17-CR-350). He has extensive experience litigating federal criminal cases and his work on this case has already greatly aided Mr. Gumora (and me), and will continue to do so, while representing a cost saving measure to the Court.

Because of the challenges, both professional and personal, posed by the COVID-19 pandemic, this request was not made closer in time to my appointment. I ask that the Court grant it now *nunc pro tunc* so that the work already performed by Mr. Ruddy may be recognized. If the Court is inclined to grant this request, I respectfully request that Mr. Ruddy be appointed at the associate rate of \$110 per hour.

I thank Your Honor for your consideration and wish everyone well.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone